

1 LYSSA S. ANDERSON
Nevada Bar No. 5781
2 RYAN W. DANIELS
Nevada Bar No. 13094
3 KAEMPFER CROWELL
1980 Festival Plaza Drive, Suite 650
4 Las Vegas, Nevada 89135
Telephone: (702) 792-7000
5 Fax: (702) 796-7181
landerson@kcnvlaw.com
6 rdaniels@kcnvlaw.com

7 *Attorneys for Defendants*
8 *Armando Lozano-Carrera and Milton Hsieh*

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 VINCENT FREEMAN, II,

12 Plaintiff,

13 vs.

14 ARMANDO LOZANO-CARRERA, in his
individual and official capacities; and
15 MILTON HSIEH, in his individual and
official capacities; et al.

16 Defendants.

CASE NO.: 3:18-cv-00192-MMD-WGC

**STIPULATION AND ORDER TO
EXTEND DISPOSITIVE MOTION
DEADLINE**

(First Request)

17 Defendants Armando Lozano-Carrera and Milton Hsieh (the “LVMPD Defendants”) and
18 Vincent Freeman II (“Plaintiff”) agree and stipulate to extend the dispositive motion deadline
19 currently set for October 28, 2020 for fifty five days making the new dispositive motion deadline
20 December 22, 2020. The extension is being requested because Plaintiff recently served a
21 subpoena to the Regional Justice Center seeking any video evidence of the incident claimed by
22 Plaintiff in this lawsuit. The parties agree that if the Regional Justice Center produces any video
23 footage of the incident, such footage could resolve some issues and potentially impact any
24 dispositive motion.

1 The Regional Justice Center has until November 22, 2020 to respond to the subpoena so
 2 the parties agree that the dispositive motion deadline should be extended by thirty days after the
 3 response deadline to file a dispositive motion. Thirty days after November 22, 2020 is December
 4 22, 2020.

5 The parties request this extension prior to the expiration of the twenty-one deadline as
 6 forth in LR 26-4. As mentioned above, there is good cause for the extension because video
 7 evidence produced by the Regional Justice Center may resolve issues on a dispositive motion. As
 8 such, the extension will not prejudice any party and may potentially help the parties properly
 9 brief their dispositive motions for this Court. The parties are not delaying the conclusion of this
 10 matter; no trial date has yet been ordered.

11 DATED this 6th day of October, 2020.

12 KAEMPFER CROWELL

13 By: /s/ Ryan W. Daniels
 14 LYSSA S. ANDERSON
 Nevada Bar No. 5781
 RYAN DANIELS
 Nevada Bar No. 13094
 15 1980 Festival Plaza Drive, #650
 Las Vegas, Nevada 89135
 16 *Attorneys for Defendants*
Armando Lozano-Carrera and Milton
 17 *Hsieh*

By: /s/ Travis N. Barrick
 Travis N. Barrick, Esq.
 Nevada Bar No. 9257
 GALLIAN WELKER, & BECKSTROM
 540 E. St. Louis Avenue
 Las Vegas, Nevada 89104
Attorney for Plaintiff Vincent Freeman

18 **IT IS SO ORDERED.**

19 DATED: October 6, 2020.

20
 21 *William G. Cobb*

22 UNITED STATES MAGISTRATE JUDGE